

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

KATERRA INC., *et al.*,¹

Debtor.

Chapter 11

Case No. 21-31861 (DRJ)

(Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE

PLEASE TAKE NOTICE that pursuant to section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and Federal Rule of Bankruptcy Procedure 2002 (the “Bankruptcy Rules”), Parkins Lee & Rubio LLP hereby enters its appearance in the above-captioned chapter 11 cases as co-counsel to Greensill Limited (in liquidation) acting by its joint liquidators, Andrew Charters and Sarah O’Toole of Grant Thornton UK LLP of 30 Finsbury Square, London, UK EC2A 1AG (“Greensill Limited (in liquidation)”), a creditor herein. The undersigned respectfully requests that all notices given or required to be given in this proceeding and all papers served or required to be served in this proceeding, be served upon the following:

Lenard M. Parkins
Charles M. Rubio
R. J. Shannon
PARKINS LEE & RUBIO LLP
Pennzoil Place
700 Milam Street, Suite 1300
Houston, Texas 77002
Email: lparkins@parkinslee.com
crubio@parkinslee.com
rshannon@parkinslee.com
Phone: 713-715-1660

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.primeclerk.com/katerra>.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Service is not only for the notices and other documents referred to in the Rules specified above but includes, without limitation, all orders, notices, applications, motions, petitions, schedules of assets and liabilities, statements of financial affairs, pleadings, requests, complaints or demands, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, email or otherwise.

PLEASE TAKE FURTHER NOTICE that Greensill Limited (in liquidation) does not intend that this Notice of Appearance and Request for Service or any later appearance, pleading, proof of claim, claim or suit be deemed or construed to be a waiver of (1) the right to have final orders entered only after de novo review by a District Judge, (2) the right to trial by jury in any proceeding so triable in these cases or any case, controversy or proceeding related to these cases, (3) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, defenses, setoffs, or recoupments to which Greensill Limited (in liquidation) is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments Greensill Limited (in liquidation) expressly reserves. All of Greensill Limited (in liquidation) rights are reserved and preserved, without exception and without confessing or conceding jurisdiction in any way by this filing or by any other participation in this case.

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Dated: October 15, 2021

Respectfully Submitted

/s/ Lenard M. Parkins

PARKINS LEE & RUBIO LLP

Lenard M. Parkins PLLC

TX Bar No. 15518200

Charles M. Rubio P.C.

TX Bar No. 24083768

R. J. Shannon

TX Bar No. 24108062

Pennzoil Place

700 Milam Street, Suite 1300

Houston, Texas 77002

Email: lparkins@parkinslee.com

crubio@parkinslee.com

rshannon@parkinslee.com

Phone: 713-715-1660

Co-Counsel to Greensill Limited (in liquidation)

CERTIFICATE OF SERVICE

I hereby certify that on October 15, 2021, the forgoing document was served through the Court's CM/ECF System on all parties registered to receive such service.

/s/ R.J. Shannon

R.J. Shannon